

Kansas Department of Health and Environment
Bureau of Waste Management Policy 02-04

Related to

K.A.R. 28-29-113(c) Appendix I Modification

August 16, 2002

This Bureau of Waste Management policy modifies the Kansas Administrative Regulations (K.A.R.) 28-29-113(c) Appendix I chemical list by removing the geochemical constituents list and adding methyl tert-butyl ether (MTBE) in the volatile organic compound (VOC) list for detection monitoring at Municipal Solid Waste Landfills (MSWLFs).

Background

K.A.R. 28-29-113(c) Appendix I is the list of chemicals required for analysis of groundwater during detection monitoring at MSWLFs. In the Federal Register 40 CFR 258.54, the U.S. Environmental Protection Agency (EPA) provides a list of chemicals to be analyzed; however, the EPA allows states to specify a set of indicator parameters for detection monitoring.

The cost to the landfills associated with the groundwater analysis for K.A.R. 28-29-113 Appendix I geochemicals (i.e., alkalinity, calcium, chemical oxygen demand, chloride, nitrogen as ammonia, dissolved potassium, dissolved sodium, sulfate, and total dissolved solids) may outweigh the benefits of the analytical results. The natural background levels, or seasonal variability, of geochemical constituents may mask the detection of a statistically significant release of those chemicals. Geochemical constituents are generally not the precursor to a volatile organic compound (VOC) detection.

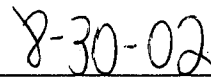
KDHE is allowed to request additional chemical analytes for facilities in detection monitoring under K.A.R. 28-29-113(a)(1). MTBE is the most mobile dissolved constituent of gasoline and therefore could be the first VOC found during detection monitoring. Early detection of groundwater contamination can expedite corrective action and provide better protection of human health and the environment.

Policy Decision

The geochemical list of K.A.R. 28-29-113(c) Appendix I is no longer required for detection monitoring of MSWLFs. MTBE is included in the VOC list at MSWLFs performing detection monitoring under K.A.R. 28-29-113(c) Appendix I. These changes will be incorporated in revised regulations following standard adoption procedures.



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Date